

## United States District Court

SOUTHERN

DISTRICT OF  
MCALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA  
v.

Nadia Aidhen Perez-Charles

YOB: 1988

Principal  
the United Mexican StatesCRIMINAL COMPLAINT  
United States District Court  
Southern District of Texas  
FILEDCase Number:  
M-16-1704 -M

SEP 11 2016

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 9, 2016 in Hidalgo County, in the Southern District of Texas defendants(s) did,

(*Track Statutory Language of Offense*)

**knowing or in reckless disregard of the fact that Rudi Rene Tinoco-Giron and Yeibin Adilcar Tobar-Merlos, citizens and nationals of Guatemala, along with ten (10) other undocumented aliens, for a total of twelve (12), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation,**

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) **FELONY**  
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

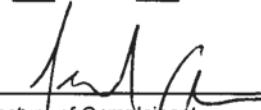
On September 9 2016, Border Patrol Agents M. Gonzalez and F. Soto assigned to the Rio Grande Valley (RGV) Field Intelligence Team (FIT) received information from Weslaco Border Patrol Agents regarding information received from a debrief of two illegal aliens. The illegal aliens claimed a female, identified as Nadia PEREZ-Charles, would drop off food to a stash house on Colbath Ave. Further investigation revealed that PEREZ had been previously deported and was illegally present in the United States.

Agents Gonzalez and Soto conducted surveillance at the residence on 2535 Colbath Ave. in McAllen, Texas. Agents observed a green Chevrolet Suburban being driven by a female, later identified as Nadia PEREZ-Charles,

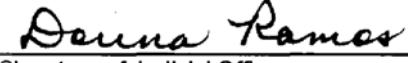
**SEE ATTACHED**

Continued on the attached sheet and made a part of this complaint:

Yes  No

  
Signature of Complainant  
Jon M. Chan  
Printed Name of Complainant

at McAllen, Texas  
City and State

  
Signature of Judicial Officer

Sworn to before me and subscribed in my presence,

September 11, 2016

Date

Dorina Ramos, U. S. Magistrate Judge  
Name and Title of Judicial Officer

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS

ATTACHMENT TO CRIMINAL COMPLAINT:

M-16- 1704 -M

RE: Nadia Aidhen Perez-Charles

**CONTINUATION:**

with a male passenger drop off three pizzas and bottles of water at the residence. PEREZ approached the residence and unlocked the front door.

PEREZ and another person later departed the residence in the green Suburban. Due to PEREZ's immigration status and the information received regarding the residence being used as a stash house to harbor illegal aliens, agents contacted Hidalgo County Constables for assistance. Deputy J. Vasquez conducted a traffic stop and issued a warning for Defective Tail Lamp(s), Change Lane When Unsafe and No Driver's License (when unlicensed) to the driver of the green Suburban. Agents Gonzalez and Soto approached the traffic stop and identified themselves as Border Patrol Agents and questioned both people as to their immigration status. Both people admitted to being in the United States illegally. PEREZ was asked by agents where she was coming from, to which she replied she was coming from her residence on Colbath Ave. in McAllen. PEREZ was then asked if there were any weapons or drugs at the residence to which PEREZ freely admitted that there were no weapons or drugs at the residence but there were twelve people there. PEREZ was read her Miranda Rights, stated she understood her rights and was willing to answer questions without the presence of an attorney.

PEREZ admitted to being the caretaker of the residence and that she knew that there are twelve illegal aliens at the residence on Colbath Ave. PEREZ claimed she had been renting the residence for six months. PEREZ gave agents written consent to search the residence and provided the agents with a key to the house.

RGV FIT Agents along with McAllen Border Patrol Agents and Hidalgo County Constables arrived to the residence on Colbath Ave. and knocked on the door. After there was no answer, while unlocking the front door, agents and deputies observed one person exit the residence through an open window and attempt the abscond. The person was apprehended and a total of twelve people were encountered hiding in different rooms throughout the residence.

All subjects were questioned by agents and admitted to being in the United States illegally. All subjects were transported to the Weslaco Border Patrol Station for interview and case preparation.

**Principal Statement:**

Nadia Aidhen PEREZ-Charles was advised of her Miranda Rights, stated she understood her rights and agreed to answer questions without the presence of an attorney.

PEREZ claimed she was being paid 70.00 USD per illegal alien to stash the illegal aliens at her residence located at 2535 Colbath Ave in McAllen, Texas. PEREZ stated she transported the twelve people to her residence and that she knew they all were illegally present in the United States. PEREZ further stated she would take several food items every day to her residence for the illegal aliens. PEREZ was in possession of approximately 3,000 USD to which she admitted 500.00 USD of it was received from human smuggling.

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Material Witness Statements:

Rudi Rene TINOCO-Giron and Yeibin Adilcar TOBAR-Merlos, citizens and nationals of Guatemala, were advised of their Miranda Rights, stated they understood their rights and agreed to answer questions without the presence of an attorney.

Material Witness 1:

Rudi Rene TINOCO-Giron claimed he was charged 7,000 USD to be smuggled to Houston, Texas. TINOCO crossed the Rio Grande River with four other people near Roma, Texas and was picked up and transported to the residence he was apprehended at. TINOCO stated a female was in charge of the residence and she arrived after they had arrived to the residence and gave the group food. TINOCO claimed the female would go to the house every day to check on them and take them food items.

TINOCO identified Nadia Aidhen PEREZ-Charles, in a photo lineup as the female who check on them and take them food.

Material Witness 2:

Yeibin Adilcar TOBAR-Merlos claimed his family paid an unknown amount of money to a smuggler once he arrived to the stash house. TOABR was to pay an additional payment for an unknown amount once he arrived to Houston, Texas. TOBAR claimed that after crossing the Rio Grande River on a raft, he was picked up and transported to the stash house in McAllen, Texas. TOBAR stated a female would go to the stash house once or twice a day; she would provide food, water and would give instructions such as were to sleep and what to cook. The same female would open the door and accept more people in the house.

TOBAR identified Nadia Aidhen PEREZ-Charles, in a photo lineup as the female who would take food and open the door for more people to enter the stash house.